

Karen O’Kasey, OSB No. 870696  
E-mail: kok@hartwagner.com  
HART WAGNER LLP  
1000 S.W. Broadway, Twentieth Floor  
Portland, Oregon 97205  
Telephone: (503) 222-4499  
Facsimile: (503) 222-2301  
Attorneys for Defendants

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON  
PORTLAND DIVISION

TYLER MILLER, an individual

Plaintiff,

v.

HENRY HEIMULLER, in his official capacity as Board Member of the Columbia 9-1-1 Communications District; BRUCE HOLSEY, in his official capacity as Board Member of the Columbia 9-1-1 Communications District; JEFF FLATT, in his official capacity as Board Member of the Columbia 9-1-1 Communications District; and SHELLEY HENNESSY, in her official capacity as Board Member of the Columbia 9-1-1 Communications District, and the COLUMBIA 9-1-1- COMMUNICATIONS DISTRICT, an Oregon Municipal corporation,

Defendants.

Case No 3:23-cv-00293-SI

**DEFENDANTS’ UNOPPOSED MOTION  
FOR EXTENSION OF TIME TO FILE  
RESPONSE TO MOTION FOR PARTIAL  
SUMMARY JUDGMENT**

**L.R. 7.1. CERTIFICATION**

Counsel for the parties conferred and plaintiff does not oppose this motion.

**MOTION FOR EXTENSION OF TIME**

Defendants move the court for an order extending the deadline for their response to plaintiff’s motion for partial summary judgment. The current deadline for the response is

September 12, 2023. Defendants request a ten-day extension of the existing deadline, up through

and including September 22, 2023. The undersigned's trial preparation and deposition schedule has delayed her ability to respond to this motion. This request is not made for purposes of delay. No oral argument has yet been set on this motion. The parties have a two-day judicial settlement conference scheduled for October 26<sup>th</sup> and October 27<sup>th</sup> before Judge Michael McShane.

Respectfully submitted this 8<sup>th</sup> day of September, 2023.

HART WAGNER LLP

By: /s/ Karen O'Kasey

Karen O'Kasey, OSB No. 870696  
Of Attorneys for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on the 8<sup>th</sup> day of September, 2023, I served the foregoing  
**DEFENDANTS' UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE  
RESPONSE TO MOTION FOR PARTIAL SUMMARY JUDGMENT** on the following  
party at the following address:

Clifford S. Davidson  
Drew L. Eyman  
Snell & Wilmer LLP  
1455 SW Broadway Ste 1750  
Portland OR 97201  
*Of Attorneys for Plaintiff*

by electronic means through the Court's Case Management/Electronic Case File system.

/s/ Karen O'Kasey  
Karen O'Kasey